

COURTNEY M. PRICE  
Vice President  
CHEMSTAR



December 13, 2001

**Via US Mail and e-mail**

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency (EPA)  
P.O. Box 1473  
Merrifield, VA 22116

RECEIVED  
OPPT NCIC  
2001 DEC 20 AM 10:50

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.  
HPV Chemical Challenge Program Submission  
Substituted p-Phenylenediamines (PPD) Category  
Category Justification and Testing Rationale**

Dear Governor Whitman:

The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our test plan for a category covering five of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Bayer Corporation, Ciba Specialty Chemicals Corporation, Crompton Corporation, Flexsys America L.P., The Goodyear Tire & Rubber Company, The Lubrizol Corporation, Noveon, Inc., R.T. Vanderbilt Company, Inc., and UOP, LLC.

In this submission, please find the *Category Justification and Testing Rationale* for the category *Substituted p-Phenylenediamines*. Five chemicals in the category are sponsored in the Program, as listed in the following table:

| RAPA Panel   |  |
|--|--|
| Substituted p-Phenylenediamine Category                      |  |
| Chemicals Sponsored in the US HPV Chemical Challenge Program |  |
| CAS Number   | Compound Name  |
| 101-96-2   | p-Phenylenediamine, N,N-di-sec-butyl                   |
| 3081-14-9  | p-Phenylenediamine, N,N-bis(1,4-dimethylpentyl)        |
| 68953-84-3   | 1,4-Benzenediamine, N,N'-mixed Ph and toyl derivatives |
| 3081-01-4  | p-Phenylenediamine, N-(1,4-dimethylpentyl) N'-phenyl   |
| 45233-47-3   | p-Phenylenediamine, N-(1-methylheptyl)-N'-phenyl       |



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RAPA-HPV  
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Data for two additional chemicals in the category, listed in the table below, are used to support the conclusions reached for the category.

| RAPA Panel<br>Substituted p-Phenylenediamines Category<br>Additional Chemicals in the Category |   |
|--|---|
| CAS Number   | Compound Name                                       |
| 103-90-2   | p-Phenylenediamine, N-Isopropyl-N'-phenyl-          |
| 7035-94-5  | p-Phenylenediamine, N-(1,3-dimethylbutyl) N'-phenyl |

In addition to the *Category Justification and Testing Rationale*, please also find attached robust summaries contained in IUCLID-formatted documents for each of the five sponsored chemicals and the two supporting chemicals in the category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov  
Chem.rtl@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or [anne\\_lehuray@americanchemistry.com](mailto:anne_lehuray@americanchemistry.com).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

#### Attachments

Cc: C. Auer, EPA/OPPT  
B. Leczynski, EPA/OPPT  
RAPA Panel (without attachments)  
S. Russell, ACC (without attachments)